

1 DAVID C. SHONKA  
Acting General Counsel  
2 SARAH WALDROP  
MICHELLE SCHAEFER  
3 Attorneys  
Federal Trade Commission  
4 600 Pennsylvania Avenue, NW  
Mailstop CC-9528  
5 Washington, DC 20580  
Telephone: 202-326-3444 (Waldrop)  
6 Telephone: 202-326-3515 (Schaefer)  
Facsimile: 202-326-3197  
7 Email: [swaldrop@ftc.gov](mailto:swaldrop@ftc.gov), [mschaefer@ftc.gov](mailto:mschaefer@ftc.gov)

8 STEVEN W. MYHRE  
Acting United States Attorney  
9 BLAINE T. WELSH  
Assistant United States Attorney  
10 Nevada Bar No. 4790  
501 Las Vegas Blvd. South, Suite 1100  
11 Las Vegas, Nevada 89101  
Phone: 702-388-6336  
12 Facsimile: 702-388-6787  
Email: [blaine.welsh@usdoj.gov](mailto:blaine.welsh@usdoj.gov)

13 *Attorneys for Plaintiff Federal Trade Commission.*  
14

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17	FEDERAL TRADE COMMISSION,	)	
18		)	Case No: 17-cv-02000-APG-GWF
19	Plaintiff,	)	
20	v.	)	<b>DECLARATION OF COUNSEL</b>
21	REVMOUNTAIN, LLC, <i>et al.</i> ,	)	<b>REGARDING EMERGENCY JOINT</b>
22	Defendants.	)	<b>MOTION OF PLAINTIFF FTC AND</b>
		)	<b>DEFENDANT BLAIR MCNEA TO</b>
		)	<b>ENTER STIPULATED ORDER TO</b>
		)	<b>RELEASE FUNDS</b>

23 Pursuant to Local Rule 7-4(a), Plaintiff Federal Trade Commission ("FTC") submits this  
24 declaration of counsel in support of the Emergency Joint Motion of Plaintiff FTC and  
25 Defendant Blair McNea to Enter Stipulated Order to Release Funds.

26 (1) The FTC and Defendant McNea file this motion as an emergency motion following  
27 the direction of the Court at the preliminary injunction hearing on August 29, 2017, that  
28

1 motions to release funds for living expenses should be filed as emergency motions. The FTC  
2 and Defendant McNea further state that release of funds for living expenses is an urgent matter  
3 for the Court's consideration.

4 (2) The movants and affected parties are Plaintiff FTC and Defendant Blair McNea.  
5 The FTC's office address and counsel's telephone numbers are: Sarah Waldrop and Michelle  
6 Schaefer, 600 Pennsylvania Ave. NW, Mailstop CC-9528, Washington, DC 20580, 202-326-  
7 3444 (Waldrop), 202-326-3515 (Schaefer). Defendant McNea's counsel's office address and  
8 telephone number are: Giovanni Ruscitti, Berg Hill Greenleaf Ruscitti LLP, 1712 Pearl Street,  
9 Boulder, CO 80302, 303-402-1600.

10 (3) The joint movants have no dispute regarding entry of the attached stipulated order.  
11 The movants did not contact other parties to this matter regarding this joint motion because the  
12 attached stipulated order concerns and affects only Defendant McNea.

13 Respectfully submitted this 26th day of September, 2017.

14 /s/ Michelle Schaefer  
15 SARAH WALDROP  
16 MICHELLE SCHAEFER  
Attorneys for Federal Trade Commission  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28